



August 24, 2012

Mr. Matt Hostak
Air Engineer
Department of Natural Resources
625 E. County Road Y
Suite 700
Oshkosh, Wisconsin 54901-9731

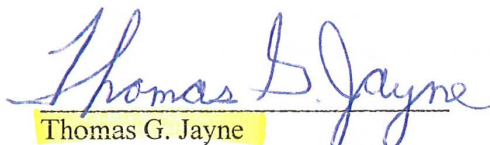
RE: 1st Half 2012 Title V Permit Summary Monitoring Report
Reporting Period: January 1- June 30, 2012

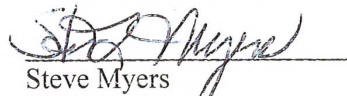
Dear Matt:

This report is a summary of the compliance status of the monitoring requirements in the Title V Operation Permit 445031180-P12 for the reporting period January 1-June 30, 2012. The permit page numbers and permit references refer to the current permit in effect. Any deviations from permit conditions or excess emissions during this reporting period are summarized in **Appendix A** attached.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Sincerely,


Thomas G. Jayne
Manager, Environmental Services


Steve Myers
Mill Manager

1st Half 2012 Title V Permit Summary Monitoring Report			
Thilmany, LLC Kaukauna, WI			
Permit No.	Permit No. 445031180-P12		
Reporting Period:	January 1, 2012 - June 30, 2012		
Permit Reference	Compliance (In or Out)	Monitoring Range if applicable	
page 9			
A.1.b.(3)	In	monitored in PI	
page 10			
A.1.c.(5)	In	monitored in PI	
A.3.a.(2)	In	No. 6 fuel oil ranged from 1.185 - 1.729 % S	
page 11			
A.3.b.(1)	In	SO2 emissions ranged from .0-7 pounds/hr; 24 hr ave	
page 12			
A.5.c.(1)	In	No alternative fuels used in the boiler during the reporting period	
page 13			
B.1.b.(3)	In	recorded on Power Boiler Emission Control Checklist	
B.1.c.(2)	In	recorded on General Utilities Fuel Distribution Report	
B.1.c.(4)	In	recorded on Power Boiler Emission Control Checklist	
page 15			
B.1.c.(9)	In	monitored in PI	
B.2.c.(2)	In	Submitted 1st and 2nd Q 2012 EE Reports	
page 16			
B.3.c.(2)	In	SO2 emissions range from 3.47-4.90 lbs SO2/MMBTU; 24 hour ave	
B.3.c.(3)	In	and 683-2082 lbs SO2/hr; 24 hr ave	
B.3.a.(3)	In	No. 6 fuel oil ranged from 1.185 - 1.729 % S	
page 17			
B.5.c.(2)	In	SO2 emissions ranged from 4155-4945 lbs./month; 12 mo rolling ave.	
B.5.c.(3)	In		
B.5.c.(4)	In		
page 18			
B.6.c.(1)	Intermittent	% heat input from TDF ranged from 4.44-9.9 %	Incident report submitted on 5/3/12
B.6.c.(2)	In	recorded on General Utilities Fuel Distribution Report	
page 19			
C.1.c.(2)	In	Package Boiler was not used during the reporting period.	
page 20			
D.1.b.(4)	In	Recorded on #19 Air Emission Data Sheet	
D.1.c.(2)	In	Recorded on General Utilities Fuel Distribution Report	
page 21			
D.2.a	Intermittent	COMS daily reports; one 6 minute period of excess opacity on 4/19/12	
D.1.c.(3)	In	Recorded on #19 Air Emission Data Sheet	
D.1.c.(5)	In	on file, ESP performance and rapper programs reviews; no changes made to programs	
D.1.c.(6)	In	Recorded on #19 Air Emission Data Sheet	
D.1.c.(8)	In	Recorded on #19 Air Emission Data Sheet	
page 22			
D.2.c.(2)	In	Submitted 1st and 2nd Q 2012 EE Reports	
D.3.b.(2)	In	SO2 emissions ranged from 30.2- 228.4 lbs SO2/hr; 24 hr ave	
D.3.(2)	In	No. 6 fuel oil ranged from 1.185 - 1.729 % S	
page 24			
E.1.c.(2)	In	Recorded on the MACT II CMS summary sheet	
page 25			
E.3.c.(1)	In	Recorded on MACT II CMS summary sheet	
page 26			
E.4.b.(1)	In	Recorded on MACT II CMS summary sheet	
E.4.b.(2)	In	Recorded on MACT II CMS summary sheet	
E.4.b.(3)	In	Recorded on MACT II CMS summary sheet	
page 27			
F.1.c.(2)	In	Recorded on Lime Kiln Report #22	
page 28			
F.3.a	In	No. 6 fuel oil ranged from 1.185 - 1.729 % S	
F.3.b.(1)	In	SO2 emissions ranged from 2-172 lbs SO2/hr; 24 hr ave basis	
page 29			
F.4.c.(2)	In	NOx emission rate ranged from 3.12- 7.26 lbs./hr; 24 hr ave	
page 30			
F.6.b.(1)	Intermittent	see Appendix A	
F.6.c.(2)	In	TRS and O2 CEMS reports on file	
F.6.c.(3)	In	TRS ppmv 12 hr block averages ranged from 0.04- 3.42 ppmv corrected to 10% O2	
F.6.c.(6)	In	1st and 2nd Q 2012 EE reports submitted	

Permit Reference	Compliance (In or Out)	Monitoring Range if applicable
page 31		
F.7.b.(2)	In	Recorded on MACT II CMS summary sheet
F.7.b.(3)	In	Recorded on MACT II CMS summary sheet
page 32		
G.1.c.(2)	In	Recorded on Lime Kiln TRS Log
page 33		
H.4.c.(2)	In	Recorded on monthly NCG LVHC walkdown checklists Annual Method 21 reports on file
page 34		
H.4.c.(3)	In	Recorded on monthly condensate walkdown checklists
page 35		
H.4.b.(7)	In	new MeOH average calculated and updated annually in Proficy -current value is 3031 ppm
H.4.b.(8)	In	
page 36		
H.4.b.(9)	In	calculated in Proficy
page 37		
H.4.b.(11)	In	calculated in MACT reporting system; submitted with EE reports
page 38		
H.5.c.(2)	In	submitted with 1st and 2nd Q 2012 EE Reports
page 41		
K.1.c.(2)(b)	In	Paper Machine PM emission rates ranged from .33-.80 lbs./hr, monthly ave basis
page 42		
K.3.c.(3)	In	Paper Machine size press VOC emissions : P11- 316-933 lbs/mo P13- 0 lbs./mo P14- 772-1242 lbs./mo P15- 0-182 lbs./mo
page 43		
L.1.c.(2)	NA	P52 Extruder was removed.
page 44		
L.2.c.(2) (d)	In	P33- VOC emissions ranged from 30-53 lbs./mo P33 REMOVED on 3/17/12
page 45		
L.3.c.(3)	In	Submitted 1st half 2012 Paper Coating MACT compliance report
L.3.c.(4)	In	% monthly HAP content of coating applied ranged from .28-.36 % by wt.
page 46		
M.1.c.(2)	NA	Monthly ave PM emission rates ranged from : P55- REMOVED P56- REMOVED P59-REMOVED
page 47		
M.3.a.(3)	NA	P72 REMOVED
M.3.a.(5)	NA	All poly extruders have been REMOVED
M.3.a.(6)	NA	Monthly VOC emission rates ranged from: P55- REMOVED; P59- 309-871 lbs./month;P76-REMOVED
page 48		
M.4.c.(2)	NA	All flexo presses have been REMOVED
page 49		
M.5.c.(2)	NA	P72 has been REMOVED
page 50		
N.1.c.(1)	In	Log on file
page 55		
O.5.b.(1)	In	No. 6 fuel oil ranged from 1.185 - 1.729 % S
O.6.b.(1)	In	facility SO2 emissions ranges from /001- 7681 tons SO2; 12 mo rolling ave basis
page 60		
O.8.b.(4)	In	records on file
page 62		
O.8.b.(7)	In	1st and 2nd Q 2012 EE reports were submitted
O.8.b.(8)	In	MACT semiannual EE and CMS Performance report submitted
page 63		
O.9.a and b	In	PM emission compliance stack test on No. 11 Boiler only was completed on 12/2/09. The average emission rate as .04 lbs PM/MMBtu
page 64		
O.10.b.(1)	In	annual emission of selected HAPS are reported on the 2011 Air Emission Inventory

Appendix A

Permit Deviations and Excess Emissions for the Reporting Period January 1, 2012- June 30, 2012

<u>Permit Reference</u>	<u>Deviation or Excess Emission</u>
Page 18 B.6.a.	As previous reported on May 3, 2012, April 2012 TDF content in B09 and B11 was 9.9% on heat input basis.
Page 21 D.2.a.	There was one 6 minute period of excess opacity (25.9%) from S10 on 4/19/12 and previously reported in the 2 nd Q 2012 Excess Emissions Report.
Page 30 F.6.b.(1)	As previously reported on the quarterly excess emissions reports, The LVHC NCG collection and incineration system experienced the following vent time for the reporting period: 33.0 minutes including SSM events or 0.01 % of the operating time. There were a total of 29 vents.